

U.S. ENVIRONMENTAL PROTECTION AGENCY
 POLLUTION/SITUATION REPORT
 Crop Production Services - Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 Region VI**

Subject: POLREP #2
 Final
 Crop Production Services

Roanoke, LA
 Latitude: 30.3208500 Longitude: -92.7414400

To: Robert Sherman, Weston Solutions

From: William Rhotenberry, OSC

Date: 8/26/2009

Reporting Period: 8/20/09

1. Introduction

1.1 Background

Site Number:	Contract Number:	
D.O. Number:	Action Memo Date:	
Response Authority: CERCLA	Response Type:	Emergency
Response Lead: PRP	Incident Category:	Removal Assessment
NPL Status: Non NPL	Operable Unit:	
Mobilization Date: 8/12/2009	Start Date:	
Demob Date:	Completion Date:	
CERCLIS ID:	RCRIS ID:	
ERNS No.:	State Notification:	
FPN#:	Reimbursable Account #:	

1.1.1 Incident Category

1.1.2 Site Description

Crop Production Services is the owner of a warehouse at 8050 Bryan Road near Roanoke, LA. The facility was rented to a company called Stillwater Resources aka TL2 Gas which manufactured and packaged specific chemicals under contract to the Department of Defense. The company would mix a specific chemical recipe and package it into cylinders for shipment to the Aberdeen Proving Grounds (APG). The cylinders were then returned to Stillwater/TL2 from APG. It is unclear whether the cylinders were returned completely empty.

The owner of Stillwater and TL2 Gas (Michael Annaker) has been conducting these activities for at least 11 years. CPS recently notified the Louisiana Department of Environmental Quality that Mr. Annaker had quit paying his rent and has abandoned the Bryan Road facility.

CPS contracted with Clean Harbors to conduct an assessment at the facility in July 2009. According to the Clean Harbors report there are approximately 600 cylinders located at the CPS warehouse. Known chemicals include hydrogen cyanide, arsenic pentafluoride, phosgene and many unknowns. Many of the cylinders exhibit extreme oxidation and are in poor condition.

1.1.2.1 Location

The facility is located at the intersection of Louisiana Highway 395 and Bryan Road, approximately 5 miles north of Roanoke, Jefferson Davis Parish, Louisiana. The facility is surrounded by agricultural fields growing rice and sugar cane.

The facility is a sheet metal building. A wood frame office building and a barn are located next to the main building. The site is not fenced

1.1.2.2 Description of Threat

The facility contains hundreds of pressurized cylinders, many of which are in poor condition. Labels on the cylinders include hydrogen cyanide, arsenic pentafluoride, phosgene, cyanogen, cyanogen chloride, carbonyl sulfide, bromine trifluoride, chlorine, and iodine pentafluoride.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On 20 August 2009, EPA START-3 returned to the site to receive seven samples for laboratory analysis. The samples were collected by Clarence E. Isom (Clean Harbors) on 18 and 19 August 2009 on behalf of Louisiana State Police. The samples were collected from suspected cyanide containing waste that was stored in six drums and from spilled solid material on the floor in the "back room" of the warehouse. On 20 August 2009 at 1631 hours, EPA START-3 relinquished the samples to Gulf Coast Analytical Services located in Baton Rouge, Louisiana for analysis. The samples consisted of four liquid and three solid samples and were to be analyzed for total cyanide (SW-846 9012A), reactive cyanide (SW-846 9012A), and corrosivity (SM 4500 H+B/SW-846 9040A) (liquid samples only). Preliminary analytical results are anticipated by 28 August 2009. The remainder of the cleanup activities at the site will be conducted by the Responsible Party under the supervision of LDEQ.

2.1.2 Response Actions to Date

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

Clean Harbors will work for the RP to remove imminent threats from the warehouse and demobilize from the site within a few days. The RP has submitted a plan to LDEQ to have the site completely remediated by February of 2010.

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

The remainder of cleanup activities will be conducted under State supervision.

2.2.2 Issues

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

The response was conducted in unified command. Louisiana State Police was the lead agency. Participating agencies include Louisiana Department of Environmental Quality, EPA, and the Lake Charles Fire Department.

3.2 Cooperating Agencies

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.